

MPC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M12-0121

-----X
UNITED STATES OF AMERICA

- against -

AFFIDAVIT IN SUPPORT OF
REMOVAL TO THE
EASTERN DISTRICT OF
TENNESSEE

JAMES FLEURY
also known as
"Jerry Fluery",

(Fed. R. Crim. P. 5(c))

Defendant.

-----X
EASTERN DISTRICT OF NEW YORK, SS:

BENJAMIN FREEMAN, being duly sworn, deposes and says that he is a Special Agent with the United States Secret Service ("USSS"), duly appointed according to law and acting as such.

Upon information and belief, on April 26, 2011, an arrest warrant was issued by the United States District Court for the Eastern District of Tennessee, commanding the arrest of the defendant JAMES FLEURY, for Counterfeiting.

The source of your deponent's information and the grounds for his belief are as follows:


1. On April 26, 2011, an arrest warrant was issued by the United States District Court for the Eastern District of Tennessee, commanding the arrest of the defendant JAMES FLEURY, for Counterfeiting pursuant to an Indictment issued by the Eastern District of Tennessee. A copy of the arrest warrant and indictment are attached.

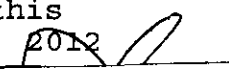
2. I am an Special Agent with the USSS currently

assigned to the Eastern District of New York. On or about January 31, 2012, I received information that the defendant, JAMES FLEURY had been arrested by the New York City Police Department for Possession of Marijuana using the name Jerry Fluery. The defendant was taken to 75th Precinct for processing. During his arrest processing the defendant was fingerprinted. A comparison of the fingerprints indicated that the individual arrested by the NYPD was in fact the defendant. Law enforcement officers in Tennessee investigating the defendant sent a copy of the defendant's pedigree information and picture to the USSS for verification. I verified that the individual pictured in the material received from the investigating agent matched the individual arrested by the NYPD. During processing by the USSS the defendant admitted that he was JAMES FLUERY from Tennessee.

3. It is the desire of the United States Attorney for the Eastern District of Tennessee that the defendant JAMES FLUERY be removed to that district for prosecution.

WHEREFORE, it is requested that the defendant JAMES FLUERY be removed to the Northern District of New York so that he may be dealt with according to law.


Benjamin Freeman
Special Agent
United States Secret Service

Sworn to before me this
2nd day of February, 2012 

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UNITED STATES DISTRICT COURT

2011 APR 27 AM 8:38

for the
Eastern District of TennesseeU.S. MARSHAL, E.D./TN
CHATTANOOGA, TENNESSEEUnited States of America
v.
James Fleury, Jerome Durkin and
Rodney Marston

Case No. 1:11-cr-34

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) James Fleury
who is accused of an offense or violation based on the following document filed with the court:

☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:
Counterfeiting.

Date: 4/26/11C. Palmer

Issuing officer's signature

City and state: Chattanooga, TennesseeCyndee Palmer, Deputy Clerk

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____

Date: _____

Arresting officer's signature

Printed name and title

FID #208606C

74-0428-1248-3

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
CHATTANOOGA**

UNITED STATES OF AMERICA)	
)	Judge Collier/Carter
v.)	
)	1:11-cr-34
JAMES FLEURY,)	
JEROME DUKINS and)	
RODNEY MERELAN)	

INDICTMENT

**COUNTS ONE THROUGH THIRTY
COUNTERFEITING**

The Grand Jury charges that on or about March 4, 2011, in the Eastern District of Tennessee and elsewhere, the defendants, JAMES FLEURY, JEROME DUKINS and RODNEY MERELAN, aided and abetted by each other, with intent to defraud, did keep in possession and conceal, falsely made, forged and counterfeited obligations of the United States, that is, Federal Reserve Notes in the denominations, Series and Serial No.'s listed below, which they then knew to be falsely made, forged and counterfeited:

Count	Denomination	Series	Serial No.
1	\$100	2006	DJ86365382A
2	\$100	2006	DJ86365376A
3	\$100	2006	DJ86365374A
4	\$100	2006	DJ86365370A
5	\$100	2006	DJ86365366A
6	\$100	2006	DJ66365397A
7	\$100	2006	DJ66365393A
8	\$100	2006	DJ66365391A
9	\$100	2006	DJ66365386A

10	\$100	2006	DJ66365385A
11	\$100	2006	FL99324164B
12	\$100	2006	FL99324153B
13	\$100	2006	FL99324148B
14	\$100	2006	FL99324144B
15	\$100	2006	FL99324142B
16	\$100	2006	FL99324137B
17	\$100	2006	FL99324161B
18	\$100	2006	FL99324152B
19	\$100	2006	FL99324146B
20	\$100	2006	FL99324141B
21	\$100	2006	DB12421009A
22	\$100	2006	DB12421020A
23	\$100	2006	DB12421031A
24	\$100	2006	DB12421005A
25	\$100	2006	DB12421010A
26	\$100	2006	DB12421016A
27	\$100	2006	DB12421013A
28	\$100	2006	DB12421027A
29	\$100	2006	DB12421022A
30	\$100	2006	DB12421029A

All in violation of Title 18, United States Code, Section 472 and 2.

A TRUE BILL:

/s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

WILLIAM C. KILLIAN
UNITED STATES ATTORNEY

By: /s/ James T. Brooks
James T. Brooks,
Assistant U.S. Attorney

CRIMINAL CASE COVER SHEET**U.S. ATTORNEY'S OFFICE**Place of Offense Chattanooga, TN; Hamilton County**Defendant Information:**Juvenile ☐ Yes ☒ NoMatter to be Sealed: ☐ Yes ☒ NoDefendant Name: James Fleury, Jerome Dukins and Rodney MerelanTotal # of Counts: ☐ Petty ☐ Misdemeanor (Class ☐) 30 Felony

	ORIGINAL INDICTMENT U.S.C. Citation(s) and Description of Offense Charged	Count(s)
Set 1	18 U.S.C. § 472 - Counterfeiting	1-30

(Use tab key after entering counts to create additional rows)

	SUPERSEDING INDICTMENT U.S.C. Citation(s) and Description of Offense Charged	New count? Y or N	New Count #	Old Count # (if applicable)
Set 1				

(Use tab key after entering counts to create additional rows)

Current Trial Date (if set): _____ before Judge _____

Criminal Complaint Filed: Yes ☐ Case No. _____ No ☒

For Informations, name of defendant's attorney:

Retained: _____ Appointed: _____

Interpreter: Yes ☐ Language _____ No ☐

Related Case(s)–Include case number(s) and how related:

Date: April 26, 2011 Signature of AUSA: /s/ James T. Brooks